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Re. Policy SS3 and Policy C10 (Merton Park).

The plan is Unsound and Legally Non-Compliant based on Transport, Habitats and Brownfield regulation failures for all of the following reasons.

1. The increased TRAFFIC CHAOS for Wincheap and Canterbury (Fails the "Duty to Cooperate" & "Effective" tests)

The Council has now abandoned the original relief roads for a "bus-led" strategy. But their own Draft Transport Strategy (Table 5.1) admits this will leave the A2/A28 Wincheap interchange and M2 J7 severely congested! Crucially, they don't have a signed legal agreement (Statement of Common Ground) with National Highways showing acceptance of this traffic chaos. Without this, the plan is legally non-compliant.

2. THE ECOLOGICAL TRAP (Fails the "Legal Compliance" & "National Policy")

The Stodmarsh Nature Reserve is failing due to water pollution from a wide area of East Kent. The Council's new March 2026 Habitats Regulations report (Para 5.5.22) explicitly admits they are "uncertain" if the environmental mitigation for 1,950 homes at Merton Park can actually be delivered! Under UK planning law (the Waddenzee principle), you cannot legally approve a plan if you are "uncertain" about its environmental damage to the area.

3. The BROWNFIELD SITES are being ignored (Fails the "Justified" test)

National policy says you must exhaust all brownfield land (previously developed areas) before destroying the greenfield sites. The Council is sacrificing the historic green setting of Canterbury to build a low-density sprawl at Merton Park, whilst completely ignoring the chance to regenerate areas such as the city-centre car parks, the near by Wincheap Industrial Estate and the many empty student houses into high-density and eco-friendly homes.

Kind regards

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Local Resident

